ILLINOIS COMMERCE COMMISSION DOCKET NO. 00-0722

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DIRECT TESTIMONY

OF

RICHARD L. MCCARTNEY

Submitted on Behalf

Of

UNION ELECTRIC COMPANY

d/b/a AmerenUE

March 2001

1		ILLINOIS COMMERCE COMMISSION
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3		DIRECT TESTIMONY OF RICHARD L. MCCARTNEY
4 5		UNION ELECTRIC COMPANY d/b/a AmerenUE
6 7	Q.	Please state your name and business address.
8	A.	My name is Richard L. McCartney. My business address is 1901 Chouteau Avenue, St.
9		Louis, Missouri 63103.
10	Q.	By whom are you employed and in what capacity?
11	A.	I am employed as a Coal Trade Executive at Ameren Energy Fuels and Services
12		Company. However, during the reconciliation period which is the subject of this
13		proceeding, I was employed as a Gas Supply Executive in the Gas Supply Department of
14		Ameren Energy Fuels and Services Company.
15	Q.	Please briefly describe Ameren Energy Fuels and Services Company.
16	A.	Ameren Energy Fuels and Services Company is an affiliate of Ameren Corporation
17		which was formed following the December 1997 merger of Union Electric Company,
18		now doing business as AmerenUE (AmerenUE or Company), and Central Illinois Public
19		Service Company, Inc. Ameren Energy Fuels and Services Company is a company
20		which provides AmerenUE and Central Illinois Public Service Company, now doing
21		business as AmerenCIPS, and the other companies of the Ameren system with a variety
22		of fuel related services, including gas procurement services.
23	Q.	Please describe your pertinent employment history.
24	A.	I was employed by Union Electric Company in June 1986 and by Ameren Corporation
25		upon the December 1997 merger. Prior to being promoted to the position of Gas Supply

1		Executive, I held several positions including coal buyer in the Fossil Fuels Department,
2		power marketer in the Energy Services Department, and resource planning engineer in
3		the Corporate Planning Department. Prior to those positions, I held positions in Finance
4		& Accounting and Transmission & Distribution.
5	Q.	Please describe your educational background.
6	A.	I received a Bachelor of Science degree in Industrial Engineering from the University of
7		Missouri at Columbia in 1986. I received a Masters of Science degree in Management
8		from Maryville University in St. Louis in 1988.
9	Q.	What were your duties and responsibilities as Gas Supply Executive?
10	A.	My responsibilities included the purchase of reliable and economic gas supply,
11		transportation and storage services for AmerenUE's Illinois gas distribution system in
12		Alton and vicinity. I also participated in proceedings before the Federal Energy
13		Regulatory Commission (FERC) involving AmerenUE's interstate pipeline suppliers and
14		before this commission and the Missouri Public Service Commission (MPSC) relating to
15		AmerenUE's natural gas distribution systems. I also assisted in performing daily
16		operations including load forecasting, system balancing, storage management,
17		nominations, and scheduling.
18	Q.	Are you familiar with the subject matter of this proceeding?
19	A.	Yes, I am. This docket is the Commission's annual reconciliation proceeding related to
20		AmerenUE's Illinois Uniform Purchased Gas Adjustment Clause (PGA). It was
21		established for the purpose of reviewing the Company's gas procurement activities under
22		its PGA for the twelve month period ending on December 31, 2000.

What is the purpose of your testimony in this proceeding?

Q.

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1	Α.	The purpose of my testimony is to provide a description of the gas procurement activities
2		performed during the reconciliation period with respect to AmerenUE's gas utility
3		distribution system located in the city of Alton, Illinois and vicinity.

- Q. Before describing such gas procurement activities, for background, please describe
 AmerenUE's gas system in Illinois.
- AmerenUE's gas system in Illinois serves Alton and adjacent areas and is separate and 6 A. distinct from the Company's Missouri gas operations. This system serves approximately 7 18,303 customers comprised of residential (62%), commercial (19%) and industrial 8 (19%) customers. The Company's customer load requirements are highly weather 9 sensitive with sharp variations in demand occurring during the peak winter season. 10 During 2000, AmerenUE's Illinois distribution system was directly connected to one 11 interstate pipeline, Mississippi River Transmission Corporation (MRT), which is 12 regulated by the FERC, and to one intrastate pipeline, Illinois Gas Transmission 13 Company (IGT), regulated by this Commission. There were no local gas fields in or near 14 the Company's gas service area from which the Company could have reliably purchased 15 direct gas supply. AmerenUE has no on-system natural gas storage, but does lease 16 17 storage services from MRT under the terms and conditions of MRT's FERC regulated Firm Storage Service (FSS). This storage is located in Lincoln Parish, Louisiana. 18 19
 - Q. Mr. McCartney, would you please describe the Company's general purchasing policy for acquiring natural gas supply and services to supply it Illinois gas system?

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1	A.	AmerenUE's natural gas acquisition policy is essentially a product of its utility obligation
2		to service. As a regulated public utility, the Company is obligated to provide natural gas
3		service to all present and future customers in its service area; it is required to meet
4		changes in its customers' demand for gas, without regard to their cause; and AmerenUE
5		is charged with providing reliable service at reasonable cost. Each gas purchasing
6		decision made on behalf of the Company is directed at satisfying this obligation to serve
7		in the most economic way.

Q. Please describe the gas transportation and storage services that were available for use by AmerenUE in 2000 to supply gas to its Illinois distribution system.

A.

The Company signed Firm Transportation Service and Firm Storage Service contracts with MRT on November 1, 1993 as a result of FERC Order 636. These original contracts have been extended through October 31, 2001. The Company also executed a Firm Transportation agreement with IGT on December 1, 1993 and amended it to increase capacity in 1998. Firm Transportation agreements with Natural Gas Pipeline Company of America (NGPL), an interstate pipeline upstream of IGT, were executed on December 1, 1993 and November 19, 1998. Current NGPL and IGT firm transportation agreements extend through 2001 to coincide with the expiration of the MRT firm transportation contract. AmerenUE also executed interruptible transportation agreements with MRT on December 1, 1989 and with IGT on September 17, 1990.

Later in my direct testimony, I will provide a summary of these contracts including their maximum daily contract quantities (MDCQ).

Q. Did the Company alter any of its gas transportation or storage agreements for use by AmerenUE in 2000?

- 1 A. No, it did not. The current transportation services on MRT, NGPL and IGT remain
 2 unchanged from the prior year.
- Q. Please provide a table that summarizes the specific pipeline services that were available to AmerenUE for transportation and storage during 2000.
- 5 A. A table summarizing such services is set forth below:

Contract	Service	Description	MDQ (MMBtu)
462	FTS	MRT Firm Transport	20,887/18,636 (1)
503	FSS	MRT Firm Storage	12,774 (2)
I100010	FT	IGT Firm Transport	8,000
106214	FTS	NGPL Firm Transport	5,000 (3)
114450	FTS	NGPL Firm Transport	3,530 (4)
			w/alt del Fisk/Lutesville
17	IT	MRT Interruptible Transport	15,000
I100010	IT	IGT Interruptible Transport	12,000

(1) Peak/Off-Peak season

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(2) Storage injections/withdrawals transported to/from facilities on FT #462

(3) Upstream capacity delivery to IGT.

(4) Total contract is for 3,530 which includes 530 of capacity delivered to AmerenUE Fisk-Lutesville system in Missouri. Fixed reservation charges are allocated by primary delivery point capacity.

Q. Please describe AmerenUE's gas supply portfolio.

The Company's gas supply portfolio for Illinois was divided into different sources based upon firm pipeline capacity on MRT and NGPL. This allowed for diversity while retaining economies of scale.

For the peak season of January, February, and March 2000, firm gas supply agreements were acquired through competitive bidding and commenced flow in November or December 1999. The firm gas supply consisted of a base load of 2,426 MMBtu per day to be transported over MRT's West Line in Louisiana; a swing supply contract of up to 7,500 MMBtu per day to be transported over MRT's Mainline; and three swing supply agreements of 0-3,118 MMBtu, 0-2,584 MMBtu and 0-2,618 MMBtu, respectively, to be transported to IGT via upstream firm transportation on NGPL. An

additional supply source on MRT's East Line added a 0-6,073 MMBtu swing package.

The East Line supply source expired at the end of February 2000.

For the peak season of November and December 2000, new firm gas supply agreements were acquired through competitive bidding. The new firm gas supply agreements (which replaced those described above) consisted of a base load of 2,420 MMBtu per day to be transported over MRT's West Line in Louisiana and a swing supply contract of up to 4,500 MMBtu per day in November and 6,000 MMBtu per day in December to be transported over MRT's Main Line. Also acquired were three gas supply agreements of 0-3,118 MMBtu, 0-2,584 MMBtu, and 0-2,618 MMBtu, respectively, to be transported to IGT via upstream firm transportation on NGPL. An additional supply source on MRT's East Line added a 0-6,065 MMBtu swing package for the month of December 2000.

The final portion of firm gas supply for both peak seasons was available from the Company's FSS storage service agreement with MRT. This storage agreement provided for the firm withdrawal of AmerenUE's storage inventory into the firm transportation agreement with MRT for delivery to the Company's citygate.

- Q. Describe the relationship between these firm gas supply sources and the corresponding pipeline transportation capacity?
- 19 A. The maximum daily firm pipeline capacity and gas supply volumes that were available
 20 during January, February, and March 2000 are described in the table below. "MDCQ"
 21 means "Maximum Daily Contract Quantity". Firm Gas Supply quantities do not reflect
 22 exclusions for fuel and loss.

Transport Agreement Jan, Feb, Mar	Pipeline Capacity MDCQ (MMBtu)	Gas Supply Agreement Jan, Feb, Mar	Firm Gas Supply MDCQ (MMBtu)	Supplier	Price Structure
MRT FTS	20,887				
		MRT West Line Baseload	2,426	PG&E	Gas Daily First of Month Index MRT WL + \$.0149 & \$4 cap. Demand Fee of \$.0612.
77.000		MRT Main Line Swing	7,500	MRT Energy	Gas Daily Daily Index MRT ML. No Demand Fee.
		MRT East Line Swing	6,073 (1)	MRT Energy	Lesser of Gas Daily First of Month Index Chicago LDCs, Large End-Users and "Gas Daily" Daily Index Chicago LDCs, Large End Users + \$.10. Demand Fee of \$.26 (includes upstream transport on NGPL).
		MRT FSS Storage (Transported by FTS)	12,774 (Maximum)		Weighted Average Cost of Gas of \$2.55
IGT FT	8,000				
		IGT Swing NGPL MidContinent Zone	2,618	Marathon	Inside FERC First of Month Index NGPL MidContinent. Demand Fee of \$.11
		IGT Swing NGPL Louisiana Zone	2,584	OG&E	Inside FERC First of Month Index NGPL Louisiana. Demand Fee of \$.13
		IGT Swing NGPL TexOk Zone	3,118	OXY	Gas Daily Daily Index NGPL TexOk. Demand Fee of \$.005
Firm Deliverability	28,887		37,093 (2)		
Propane Total Firm	6,000 34,887		6,000 43,093 (2)		
Deliverability					

⁽¹⁾ East Line Swing was 0 for March
(2) Actual gas supply available is lower because the FSS Storage ratchets down

- 1 The maximum daily firm pipeline capacity and gas supply volumes that were available during
- 2 November and December 2000 are described in the table below:

Transport Agreement Nov, Dec	Pipeline Capacity MDCQ (MMBtu)	Gas Supply Agreement Nov, Dec	Firm Gas Supply MDCQ (MMBtu)	Supplier	Price Structure
MRT FTS	20,887				
		MRT West Line Baseload	2,420	Cinergy	27% at \$4.68 and 73% at Gas Daily First of Month Index MRT WL + \$.015. No Demand Fee.
		MRT Main	6,000 (1)	MRT	Gas Daily Daily Index MRT
		Line Swing		Energy	ML. No Demand Fee.
		MRT East Line Swing	6,065 (2)	MRT Energy	Gas Daily Daily Index Chicago LDCs, Large End Users + \$.03 & \$10 cap. Demand Fee of \$.21
		MRT FSS Storage (Transported by FTS)	12,774 (Maximum)		Weighted Average Cost of Gas of \$4.34
IGT FT	8,000			<u></u>	
		IGT Swing NGPL MidContinent Zone	2,618	Western	Gas Daily Daily Index NGPL MidContinent with \$7 cap. No Demand Fee (free because of Panhandle swap).
		IGT Swing NGPL Louisiana Zone	2,584	Noble	Inside FERC First of Month Index - NGPL Louisiana. Demand Fee of \$.43
		IGT Swing NGPL TexOk Zone	3,118	OXY	Gas Daily Daily Index NGPL TexOk. Demand Fee of \$.005.
Firm Deliverability	28,887		35,579 (3)		
Propanc	6,000		6,000		
Total Firm Deliverability	34,887	000 MMRtu for Decem	41,579 (3)		

^{(1) 4,500} MMBtu for November and 6,000 MMBtu for December

^{(2) 0} MMBtu for November and 6,065 MMBtu for December

⁽³⁾ Actual gas supply available is lower because the FSS Storage ratchets down

l	Q.	were these gas supplies generally available throughout the year, and on peak days
2		experienced by the Company?
3	A.	Yes, the gas supplies were available during the periods indicated above with no
4		exceptions.
5	Q.	Your tables above include propane as a source of firm gas deliverability. Please
6		discuss.
7	A.	As an additional supply source on peak days in 2000, AmerenUE maintained a propane-
8		air blending plant with an operational capacity of approximately 6,000 MMBtu per day.
9		This plant did not operate other than for operating tests during the reconciliation period.
10	Q.	Were other supply sources available to AmerenUE during 2000?
11		Yes. In addition to the supplies mentioned above, the Company purchased gas from the
12		short-term spot market during the off peak period (April through October). This gas was
13		used for injection into storage and for the summer requirements of the Company's Illinois
14		distribution system.
15	Q.	How was the spot market monitored for the purchase of gas?
16		Ameren Energy Fuels and Services gas supply personnel maintain communications with
17		gas producers and marketers when performing their normal job activities. A large
18		volume of information regarding the spot market is derived from these communications.
19		In addition, Ameren Energy Fuels and Services subscribes to a number of gas industry
20		publications such as Gas Daily, Inside FERC Gas Market Report, and Natural Gas Week
21		which provide spot market pricing information and industry news on a regular basis. The
22		New York Mercantile Exchange gas futures market is also monitored on a real time basis
23		by a satellite feed signal from a futures information service provider.

Spot market gas was procured by competitive bid from various suppliers on a monthly or 1 2 daily basis. AmerenUE maintains a spot market supplier list containing gas suppliers 3 qualified to bid on the spot market requirements of the Company. AmerenUE uses the 4 spot market as a "testing" ground for new suppliers since non-performance by a gas 5 supplier during the summer will not cause operational or economic harm to the Company. Mr. McCartney, how did the Company plan the utilization of its supply sources? 6 Q. The supply sources were utilized by AmerenUE to meet the operational characteristics of 7 A. its citygate loads and to comply with contract and/or tariff restrictions incorporated 8 9 within the various pipeline and supplier agreements. Baseload gas, typically being the lowest cost and contractually more restrictive, has the highest priority as to use and 10 flowed continuously during the periods when agreements were in effect. Swing gas 11 supply agreements were utilized to meet citygate load swings outside the range of the 12 FSS storage withdrawals and to control the FSS storage inventory to maintain adequate 13 storage deliverability through the month of February. FSS storage withdrawals provided 14 the "No-Notice" service required to manage significant and unpredictable load swings. 15 The propane plant was available to be utilized to meet peak day demand that exceeded 16 17 firm pipeline deliverability. Finally, spot market purchases were utilized during the offpeak season. 18 Q. What procedure was used to purchase firm gas supply to serve AmerenUE's 19 distribution system? 20 A. Written requests for bids for firm gas supply were mailed on behalf of the Company to 21 22 suppliers who were known to be reliable and capable of furnishing firm service. The

winning bids were selected based on a ranking of price with further consideration given
 to reliability and diversity of supply.

Q. Did the Company use any hedging or price control methods during 2000?

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Yes, the FSS storage provides approximately 45% of all gas required in a typical winter. During January and February of 2000, the weighted average cost of gas in storage was \$2.55 per MMBtu. During November and December of 2000, the weighted average cost of gas in storage was \$4.34 per MMBtu. These costs were significantly below the gas prices prevailing in the spot market during those periods. An additional amount of gas supply was hedged using a combination of fixed price purchases, first of the month calls, and caps. For example, during the period of January through March 2000, the West Line Baseload supply contained a \$4.00 per MMBtu cap that eliminated AmerenUE's exposure to monthly pricing in excess of \$4.00 per MMBtu. The East Line Swing supply was priced at the lesser of Gas Daily First of Month Index for Chicago LDCs, Large End-Users or Gas Daily Daily Index for Chicago LDCs, Large End-Users + \$.10 per MMBtu. This eliminated volatility for intra-month price increases while allowing AmerenUE to capture intra-month price decreases. For the extremely volatile period of November and December of 2000, approximately 65% of all gas used by our customers was hedged using a such pricing mechanisms. The pricing structures are identified in the table provided on Page 8 of this testimony.

- Q. Describe the method used to purchase propane for the Company's peak-shaving propane-air blending plant.
- 22 A. Purchasing of bulk propane supplies is only necessary after the plant is utilized during the 23 prior winter period or when testing reduces the inventory level. Because the propane

facility was tested in the year 2000, propane was purchased in the Fall of 2000. Bid
requests were transmitted by letter or telephone to suppliers of propane. Once bids were
received, a supplier was selected based on price, deliverability and quantity available.

- Q. What steps does the Company take on peak days when the daily demand level
 exceeds the supply available through its pipeline sources?
- If daily demand exceeds available gas supply, assuming there is still available pipeline 6 A. capacity, the first step of utilizing "No-Notice" storage withdrawals would automatically 7 occur if the storage service is not fully utilized. If demand was still in excess of these 8 resources, then any remaining interstate pipeline capacity along with swing gas supplies 9 would be nominated and scheduled. At this point, all available interstate pipeline 10 resources and on-system storage resources would be maximized. Curtailment of 11 interruptible services would then be declared on the distribution system. In addition, 12 transportation customers would not be allowed to withdraw from their imbalance banks 13 on the distribution systems. The final resource to be utilized would be the propane-air 14 15 plant.
- Q. Was it necessary to curtail interruptible customers or utilize the propane plant
 during 2000?
- 18 A. No.
- 19 Q. What was the Company's peak usage day in 2000?
- A. The peak usage day occurred on December 19, 2000 when a throughput of 22,728

 MMBtu was experienced on the distribution system.
- 22 Q. What sources of supply were used to meet the demand on this peak day?
- 23 A. The following table sets forth the supply sources that were used on December 19, 2000:

Supply Source	MMBtu (delivered)
Baseload	2,364
Storage	5,833
Swing	14,531
Total	22,728
Pipeline Source	MMBtu (delivered)
MRT	14,295
IGT	8,433
Total	22,728

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Q. Does AmerenUE have procedures for monitoring the delivery of purchased gas?

3 A. Yes, it does. The Company measures and records gas flow volumes from MRT and IGT 4 at points of delivery in Alton with electronic flow computer data telemetered to the Ameren Gas Operations office in Springfield, Illinois. MRT and IGT measure their 5 respective flows with orifice meters, which are integrated on-site with flow computers. 6 7 AmerenUE compares its records to MRT and IGT measurements. The Company 8 periodically requests and then witnesses calibration and inspection of measurement 9 equipment by MRT and IGT personnel. Volumes of propane deliveries are verified by comparing bills of lading against propane tank measurement gauges. 10

- 11 Q. Were the Company's gas purchases during the year consistent with its procurement policies?
- 13 A. Yes. AmerenUE utilized the most economical mix of gas sources available under the 14 given conditions.
- 15 Q. Do you believe AmerenUE's procurement of natural gas was prudent during 2000?
- 16 A. Yes, I do.
- 17 Q. Does this complete your testimony?
- 18 A. Yes, it does.